

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

FEDEX SUPPLY CHAIN LOGISTICS  
& ELECTRONICS, INC.,

*Plaintiff,*

VS.

JAMES E. GOODMAN, JR., JOHN GOODMAN, JONATHAN GOODMAN, JAKE GOODMAN, JOSEPH "JODY" GOODMAN, JAMES FRINZI, SHALOM AUERBACH, NEIL AUERBACH, STEVEN ZAKHARYAYEV, EVALINA PINKHASOVA, GENESIS NETWORKS TELECOM SERVICES, LLC, GNET ATC, LLC, GREATER TECH HOLDINGS, INC. f/k/a GOODMAN TELECOM HOLDINGS, LLC, GOODMAN INVESTMENT HOLDINGS, LLC, UNIFIED FIELD SERVICES, INC., AMERICAN METALS RECOVERY AND RECYCLING, INC. a/k/a MBG HOLDINGS, INC., MULTIBAND FIELD SERVICES, INC., HSB HOLDINGS, LLC f/k/a MULTIBAND GLOBAL RESOURCES, LLC, AMR RESOURCES, LLC, HUDSON CLEAN ENERGY ENTERPRISES, LLC, 18920 NW 11th, LLC, PROSPERITY BANCSHARES, INC., THE FRINZI FAMILY TRUST, ALLIANCE TEXAS HOLDINGS, LLC, AUERBACH PARTNERS, LP, and ONEPATH SYSTEMS, LLC,

Civil Action No. 3:23-cv-02397

*Defendants.*

**18920 NW 11TH, LLC'S ANSWER TO PLAINTIFF'S THIRD AMENDED  
COMPLAINT**

18920 NW 11th, LLC ("18920") submits its Answer to Plaintiff's Third Amended Complaint. Except as otherwise expressly admitted, 18920 denies each and every allegation contained in Plaintiff's Third Amended Complaint.

**NATURE OF THE ACTION**

1. 18920 denies the allegations in Paragraph 1.

2. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 2.

To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 2.

3. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 3.

To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 3.

4. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 4.

To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 4.

5. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 5.

To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 5.

6. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 6. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 6.

7. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 7. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 7.

8. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 8 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 8.

9. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 9 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 9.

10. 18920 cannot admit or deny the allegations in Paragraph 10 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 10.

11. 18920 cannot admit or deny the allegations in Paragraph 11 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 11.

12. 18920 cannot admit or deny the allegations in Paragraph 12 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 12.

13. 18920 cannot admit or deny the allegations in Paragraph 13 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 13.

14. 18920 cannot admit or deny the allegations in Paragraph 14 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 14.

15. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 15. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 15.

16. 18920 cannot admit or deny the allegations in Paragraph 16 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 16.

17. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 17. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 17.

18. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 18. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 18.

19. 18920 cannot admit or deny the allegations in Paragraph 19 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 19.

20. 18920 cannot admit or deny the allegations in Paragraph 20 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 20.

21. 18920 cannot admit or deny the allegations in Paragraph 21 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 21.

22. 18920 cannot admit or deny the allegations in Paragraph 22 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 22.

23. 18920 cannot admit or deny the allegations in Paragraph 23 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 23.

24. 18920 cannot admit or deny the allegations in Paragraph 24 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 24.

25. 18920 cannot admit or deny the allegations in Paragraph 26 to the extent the allegations are directed at another party. 18920 denies the allegations directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 26.

26. 18920 cannot admit or deny the allegations in Paragraph 26 to the extent the allegations are directed at another party. 18920 denies the allegations directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 26.

27. 18920 cannot admit or deny the allegations in Paragraph 27 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 27.

28. 18920 denies the allegations in Paragraph 28.

#### **PARTIES AND KEY PLAYERS**

29. 18920 cannot admit or deny the allegations in Paragraph 29 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 29.

30. 18920 cannot admit or deny the allegations in Paragraph 30 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 30.

31. 18920 cannot admit or deny the allegations in Paragraph 31 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 31.

32. 18920 cannot admit or deny the allegations in Paragraph 32 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 32.

33. 18920 cannot admit or deny the allegations in Paragraph 33 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 33.

34. 18920 cannot admit or deny the allegations in Paragraph 34 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 34.

35. 18920 cannot admit or deny the allegations in Paragraph 35 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 35.

36. 18920 cannot admit or deny the allegations in Paragraph 36 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 36.

37. 18920 cannot admit or deny the allegations in Paragraph 37 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 37.

38. 18920 cannot admit or deny the allegations in Paragraph 38 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 38.

39. 18920 cannot admit or deny the allegations in Paragraph 39 as they are vague. 18920 admits that to its knowledge, Steven Zakharyayev is a citizen of New Jersey at the New Jersey address listed in paragraph 39. 18920 otherwise denies the allegations in Paragraph 39.

40. 18920, based on information and belief, admits the allegations in Paragraph 40.

41. 18920 cannot admit or deny the allegations in Paragraph 41 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 41.



42. 18920 cannot admit or deny the allegations in Paragraph 42 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 42.

43. 18920 cannot admit or deny the allegations in Paragraph 43 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 43.

44. 18920 cannot admit or deny the allegations in Paragraph 44 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 44.

45. 18920 cannot admit or deny the allegations in Paragraph 45 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 45.

46. 18920 cannot admit or deny the allegations in Paragraph 46 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 46.

47. 18920 cannot admit or deny the allegations in Paragraph 47 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 47.

48. 18920 cannot admit or deny the allegations in Paragraph 48 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 48.

49. 18920 cannot admit or deny the allegations in Paragraph 49 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 49.

50. 18920 cannot admit or deny the allegations in Paragraph 50 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 50.

51. 18920 admits that 18920 is a Florida limited liability company. 18920 otherwise denies the allegations in Paragraph 51.

52. 18920 cannot admit or deny the allegations in Paragraph 52 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 52.

53. 18920 cannot admit or deny the allegations in Paragraph 53 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 53.

54. 18920 cannot admit or deny the allegations in Paragraph 54 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 54.

55. 18920 cannot admit or deny the allegations in Paragraph 55 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 55.

56. 18920 cannot admit or deny the allegations in Paragraph 56 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 56.

### **JURISDICTION AND VENUE**

57. 18920 cannot admit or deny the allegations in Paragraph 57 as the paragraph contains only legal conclusions. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 57.

58. 18920 cannot admit or deny the allegations in Paragraph 58 as the paragraph contains only legal conclusions. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 58.

59. 18920 denies the allegations in Paragraph 59.

### **BACKGROUND AND FACTS**

60. 18920 cannot admit or deny the allegations in Paragraph 60 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 60.

61. 18920 cannot admit or deny the allegations in Paragraph 61 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 61.

62. 18920 cannot admit or deny the allegations in Paragraph 62 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 62.

63. 18920 cannot admit or deny the allegations in Paragraph 63 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 63.

64. 18920 cannot admit or deny the allegations in Paragraph 64 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 64.

65. 18920 cannot admit or deny the allegations in Paragraph 65 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 65.

66. 18920 cannot admit or deny the allegations in Paragraph 66 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 66.

67. 18920 cannot admit or deny the allegations in Paragraph 67 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 67.

68. 18920 cannot admit or deny the allegations in Paragraph 68 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 68.

69. 18920 cannot admit or deny the allegations in Paragraph 69 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 69.

70. 18920 cannot admit or deny the allegations in Paragraph 70 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 70.

71. 18920 cannot admit or deny the allegations in Paragraph 71 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 71.

72. 18920 cannot admit or deny the allegations in Paragraph 72 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 72.

73. 18920 cannot admit or deny the allegations in Paragraph 73 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 73.

74. 18920 cannot admit or deny the allegations in Paragraph 74 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 74.

75. 18920 cannot admit or deny the allegations in Paragraph 75 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 75.

76. 18920 cannot admit or deny the allegations in Paragraph 76 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 76.

77. 18920 cannot admit or deny the allegations in Paragraph 77 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 77.

78. 18920 cannot admit or deny the allegations in Paragraph 78 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 78.

79. 18920 cannot admit or deny the allegations in Paragraph 79 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 79.

80. 18920 cannot admit or deny the allegations in Paragraph 80 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 80.

81. 18920 cannot admit or deny the allegations in Paragraph 81 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 81.

82. 18920 cannot admit or deny the allegations in Paragraph 82 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 82.

83. 18920 cannot admit or deny the allegations in Paragraph 83 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 83.

84. 18920 cannot admit or deny the allegations in Paragraph 84 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 84.

85. 18920 cannot admit or deny the allegations in Paragraph 85 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 85.

86. 18920 cannot admit or deny the allegations in Paragraph 86 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 86.

87. 18920 cannot admit or deny the allegations in Paragraph 87 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 87.

88. 18920 cannot admit or deny the allegations in Paragraph 88 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 88.

89. 18920 cannot admit or deny the allegations in Paragraph 89 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 89.

90. 18920 cannot admit or deny the allegations in Paragraph 90 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 90.



91. 18920 cannot admit or deny the allegations in Paragraph 91 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 91.

92. 18920 cannot admit or deny the allegations in Paragraph 92 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 92.

93. 18920 cannot admit or deny the allegations in Paragraph 93 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 93.

94. 18920 cannot admit or deny the allegations in Paragraph 94 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 94.

95. 18920 cannot admit or deny the allegations in Paragraph 95 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 95.

96. 18920 cannot admit or deny the allegations in Paragraph 96 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 96.

97. 18920 cannot admit or deny the allegations in Paragraph 97 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 97.

98. 18920 cannot admit or deny the allegations in Paragraph 98 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 98.

99. 18920 cannot admit or deny the allegations in Paragraph 99 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 99.

100. 18920 cannot admit or deny the allegations in Paragraph 100 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 100.

101. 18920 cannot admit or deny the allegations in Paragraph 101 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 101.

102. 18920 cannot admit or deny the allegations in Paragraph 102 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 102.

103. 18920 cannot admit or deny the allegations in Paragraph 103 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 103.

104. 18920 cannot admit or deny the allegations in Paragraph 104 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 104.

105. 18920 cannot admit or deny the allegations in Paragraph 105 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 105.

106. 18920 cannot admit or deny the allegations in Paragraph 106 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 106.

107. 18920 cannot admit or deny the allegations in Paragraph 107 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 107.

108. 18920 cannot admit or deny the allegations in Paragraph 108 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 108.

109. 18920 cannot admit or deny the allegations in Paragraph 109 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 109.

110. 18920 cannot admit or deny the allegations in Paragraph 110 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 110.

111. 18920 cannot admit or deny the allegations in Paragraph 111 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 111.

112. 18920 cannot admit or deny the allegations in Paragraph 112 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 112.

113. 18920 cannot admit or deny the allegations in Paragraph 113 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 113.

114. 18920 cannot admit or deny the allegations in Paragraph 114 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 114.

115. 18920 cannot admit or deny the allegations in Paragraph 115 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 115.

116. 18920 cannot admit or deny the allegations in Paragraph 116 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 116.

117. 18920 cannot admit or deny the allegations in Paragraph 117 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 117.

118. 18920 cannot admit or deny the allegations in Paragraph 118 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 118.

119. 18920 cannot admit or deny the allegations in Paragraph 119 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 119.

120. 18920 cannot admit or deny the allegations in Paragraph 120 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 120.

121. 18920 cannot admit or deny the allegations in Paragraph 121 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 121.

122. 18920 cannot admit or deny the allegations in Paragraph 122 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 122.

123. 18920 cannot admit or deny the allegations in Paragraph 123 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 123.

124. 18920 cannot admit or deny the allegations in Paragraph 124 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 123.

125. 18920 cannot admit or deny the allegations in Paragraph 125 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 125.

126. 18920 cannot admit or deny the allegations in Paragraph 126 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 126.

127. 18920 cannot admit or deny the allegations in Paragraph 127 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 127.

128. 18920 cannot admit or deny the allegations in Paragraph 128 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 128.

129. 18920 cannot admit or deny the allegations in Paragraph 129 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 129.

130. 18920 cannot admit or deny the allegations in Paragraph 130 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 130.

131. 18920 cannot admit or deny the allegations in Paragraph 131 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 131.

132. 18920 cannot admit or deny the allegations in Paragraph 132 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 132.

133. 18920 cannot admit or deny the allegations in Paragraph 133 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 133.

134. 18920 cannot admit or deny the allegations in Paragraph 134 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 134.

135. 18920 cannot admit or deny the allegations in Paragraph 135 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 135.

136. 18920 cannot admit or deny the allegations in Paragraph 136 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 136.

137. 18920 cannot admit or deny the allegations in Paragraph 137 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 137.

138. 18920 cannot admit or deny the allegations in Paragraph 138 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 138.



139. 18920 cannot admit or deny the allegations in Paragraph 139 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 139.

140. 18920 cannot admit or deny the allegations in Paragraph 140 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 140.

141. 18920 cannot admit or deny the allegations in Paragraph 141 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 141.

142. 18920 cannot admit or deny the allegations in Paragraph 142 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 142.

143. 18920 cannot admit or deny the allegations in Paragraph 143 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 143.

144. 18920 cannot admit or deny the allegations in Paragraph 144 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 144.

145. 18920 cannot admit or deny the allegations in Paragraph 145 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 145.

146. 18920 cannot admit or deny the allegations in Paragraph 146 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 146.

147. 18920 cannot admit or deny the allegations in Paragraph 147 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 147.

148. 18920 cannot admit or deny the allegations in Paragraph 148 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 148.

149. 18920 cannot admit or deny the allegations in Paragraph 149 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 149.

150. 18920 cannot admit or deny the allegations in Paragraph 150 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 150.

151. 18920 cannot admit or deny the allegations in Paragraph 151 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 151.

152. 18920 cannot admit or deny the allegations in Paragraph 152 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 152.

153. 18920 cannot admit or deny the allegations in Paragraph 153 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 153.

154. 18920 cannot admit or deny the allegations in Paragraph 154 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 154.

155. 18920 cannot admit or deny the allegations in Paragraph 155 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 155.

156. 18920 cannot admit or deny the allegations in Paragraph 156 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 156.

157. 18920 cannot admit or deny the allegations in Paragraph 157 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 157.

158. 18920 cannot admit or deny the allegations in Paragraph 158 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 158.

159. 18920 cannot admit or deny the allegations in Paragraph 159 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 159.

160. 18920 cannot admit or deny the allegations in Paragraph 160 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 160.

161. 18920 cannot admit or deny the allegations in Paragraph 161 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 161.

162. 18920 cannot admit or deny the allegations in Paragraph 162 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 162.

163. 18920 cannot admit or deny the allegations in Paragraph 163 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 163.

164. 18920 cannot admit or deny the allegations in Paragraph 164 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 164.

165. 18920 cannot admit or deny the allegations in Paragraph 165 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 165.

166. 18920 cannot admit or deny the allegations in Paragraph 166 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 166.

167. 18920 cannot admit or deny the allegations in Paragraph 167 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 167.

168. 18920 cannot admit or deny the allegations in Paragraph 168 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 168.

169. 18920 cannot admit or deny the allegations in Paragraph 169 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 169.

170. 18920 cannot admit or deny the allegations in Paragraph 170 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 170.

171. 18920 cannot admit or deny the allegations in Paragraph 171 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 171.

172. 18920 cannot admit or deny the allegations in Paragraph 172 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 172.

173. 18920 cannot admit or deny the allegations in Paragraph 173 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 173.

174. 18920 cannot admit or deny the allegations in Paragraph 174 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 174.

175. 18920 cannot admit or deny the allegations in Paragraph 175 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 175.

176. 18920 cannot admit or deny the allegations in Paragraph 176 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 176.

177. 18920 cannot admit or deny the allegations in Paragraph 177 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 177.

178. 18920 cannot admit or deny the allegations in Paragraph 178 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 178.

179. 18920 cannot admit or deny the allegations in Paragraph 179 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 179.

180. 18920 cannot admit or deny the allegations in Paragraph 180 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 180.

181. 18920 cannot admit or deny the allegations in Paragraph 181 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 181.

182. 18920 cannot admit or deny the allegations in Paragraph 182 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 182.

183. 18920 cannot admit or deny the allegations in Paragraph 183 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 183.

184. 18920 cannot admit or deny the allegations in Paragraph 184 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 184.

185. 18920 cannot admit or deny the allegations in Paragraph 185 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 185.

186. 18920 cannot admit or deny the allegations in Paragraph 186 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 186.



187. 18920 cannot admit or deny the allegations in Paragraph 187 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 187.

188. 18920 cannot admit or deny the allegations in Paragraph 188 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 188.

189. 18920 cannot admit or deny the allegations in Paragraph 189 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 189.

190. 18920 cannot admit or deny the allegations in Paragraph 190 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 190.

191. 18920 cannot admit or deny the allegations in Paragraph 191 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 191.

192. 18920 cannot admit or deny the allegations in Paragraph 192 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 192.

193. 18920 cannot admit or deny the allegations in Paragraph 193 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 193.

194. 18920 cannot admit or deny the allegations in Paragraph 194 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 194.

195. 18920 cannot admit or deny the allegations in Paragraph 195 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 195.

196. 18920 cannot admit or deny the allegations in Paragraph 196 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 196.

197. 18920 cannot admit or deny the allegations in Paragraph 197 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 197.

198. 18920 cannot admit or deny the allegations in Paragraph 198 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 198.

199. 18920 cannot admit or deny the allegations in Paragraph 199 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 199.

200. 18920 cannot admit or deny the allegations in Paragraph 200 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 200.

201. 18920 cannot admit or deny the allegations in Paragraph 201 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 201.

202. 18920 cannot admit or deny the allegations in Paragraph 202 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 202.

203. 18920 cannot admit or deny the allegations in Paragraph 203 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 203.

204. 18920 cannot admit or deny the allegations in Paragraph 204 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 204.

205. 18920 cannot admit or deny the allegations in Paragraph 205 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 205.

206. 18920 cannot admit or deny the allegations in Paragraph 206 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 206.

207. 18920 cannot admit or deny the allegations in Paragraph 207 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 207.

208. 18920 cannot admit or deny the allegations in Paragraph 208 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 208.

209. 18920 cannot admit or deny the allegations in Paragraph 209 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 209.

210. 18920 cannot admit or deny the allegations in Paragraph 210 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 210.

211. 18920 cannot admit or deny the allegations in Paragraph 211 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 211.

212. 18920 cannot admit or deny the allegations in Paragraph 212 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 212.

213. 18920 cannot admit or deny the allegations in Paragraph 213 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 213.

214. 18920 cannot admit or deny the allegations in Paragraph 214 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 214.

215. 18920 cannot admit or deny the allegations in Paragraph 215 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 215.

216. 18920 lacks the knowledge to admit or deny the allegations in Paragraph 216 as the allegations are directed at 18920. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 216.

217. 18920 cannot admit or deny the allegations in Paragraph 217 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 217.

218. 18920 cannot admit or deny the allegations in Paragraph 218 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 218.

219. 18920 cannot admit or deny the allegations in Paragraph 219 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 219.

220. 18920 cannot admit or deny the allegations in Paragraph 220 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 220.

221. 18920 cannot admit or deny the allegations in Paragraph 221 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 221.

222. 18920 cannot admit or deny the allegations in Paragraph 222 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 222.

223. 18920 cannot admit or deny the allegations in Paragraph 223 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 223.

224. 18920 cannot admit or deny the allegations in Paragraph 224 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 224.

225. 18920 cannot admit or deny the allegations in Paragraph 225 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 225.

226. 18920 cannot admit or deny the allegations in Paragraph 226 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 226.

227. 18920 cannot admit or deny the allegations in Paragraph 227 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 227.

228. 18920 cannot admit or deny the allegations in Paragraph 228 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 228.

229. 18920 cannot admit or deny the allegations in Paragraph 229 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 229.

230. 18920 cannot admit or deny the allegations in Paragraph 230 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 230.

231. 18920 cannot admit or deny the allegations in Paragraph 231 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 231.

232. 18920 cannot admit or deny the allegations in Paragraph 232 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 232.

233. 18920 cannot admit or deny the allegations in Paragraph 233 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 233.

234. 18920 cannot admit or deny the allegations in Paragraph 234 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 234.



235. 18920 cannot admit or deny the allegations in Paragraph 235 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 235.

236. 18920 cannot admit or deny the allegations in Paragraph 236 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 236.

237. 18920 cannot admit or deny the allegations in Paragraph 237 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 237.

238. 18920 cannot admit or deny the allegations in Paragraph 238 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 238.

239. 18920 cannot admit or deny the allegations in Paragraph 239 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 239.

240. 18920 cannot admit or deny the allegations in Paragraph 240 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 240.

241. 18920 cannot admit or deny the allegations in Paragraph 241 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 241.

242. 18920 cannot admit or deny the allegations in Paragraph 242 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 242.

243. 18920 cannot admit or deny the allegations in Paragraph 243 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 243.

244. 18920 cannot admit or deny the allegations in Paragraph 244 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 244.

245. 18920 cannot admit or deny the allegations in Paragraph 245 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 245.

246. 18920 cannot admit or deny the allegations in Paragraph 246 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 246.

247. 18920 cannot admit or deny the allegations in Paragraph 247 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 247.

248. 18920 cannot admit or deny the allegations in Paragraph 248 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 248.

249. 18920 cannot admit or deny the allegations in Paragraph 249 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 249.

250. 18920 cannot admit or deny the allegations in Paragraph 250 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 250.

251. 18920 cannot admit or deny the allegations in Paragraph 251 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 251.

252. 18920 cannot admit or deny the allegations in Paragraph 252 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 252.

253. 18920 cannot admit or deny the allegations in Paragraph 253 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 253.

254. 18920 cannot admit or deny the allegations in Paragraph 254 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 254.

255. 18920 cannot admit or deny the allegations in Paragraph 255 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 255.

256. 18920 cannot admit or deny the allegations in Paragraph 256 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 256.

257. 18920 cannot admit or deny the allegations in Paragraph 257 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 257.

258. 18920 cannot admit or deny the allegations in Paragraph 258 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 258.

259. 18920 cannot admit or deny the allegations in Paragraph 259 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 259.

260. 18920 cannot admit or deny the allegations in Paragraph 260 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 260.

261. 18920 cannot admit or deny the allegations in Paragraph 261 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 261.

262. 18920 cannot admit or deny the allegations in Paragraph 262 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 262.

263. 18920 cannot admit or deny the allegations in Paragraph 263 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 263.

264. 18920 cannot admit or deny the allegations in Paragraph 264 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 264.

265. 18920 cannot admit or deny the allegations in Paragraph 265 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 265.

266. 18920 cannot admit or deny the allegations in Paragraph 266 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 266.

267. 18920 cannot admit or deny the allegations in Paragraph 267 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 267.

268. 18920 cannot admit or deny the allegations in Paragraph 268 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 268.

269. 18920 cannot admit or deny the allegations in Paragraph 269 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 269.

270. 18920 cannot admit or deny the allegations in Paragraph 270 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 270.

271. 18920 cannot admit or deny the allegations in Paragraph 271 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 271.

272. 18920 cannot admit or deny the allegations in Paragraph 272 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 272.

273. 18920 cannot admit or deny the allegations in Paragraph 273 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 273.

274. 18920 cannot admit or deny the allegations in Paragraph 274 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 274.

275. 18920 cannot admit or deny the allegations in Paragraph 275 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 275.

276. 18920 cannot admit or deny the allegations in Paragraph 276 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 276.

277. 18920 cannot admit or deny the allegations in Paragraph 277 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 277.

278. 18920 cannot admit or deny the allegations in Paragraph 278 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 278.

279. 18920 cannot admit or deny the allegations in Paragraph 279 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 279.

280. 18920 cannot admit or deny the allegations in Paragraph 280 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 280.

281. 18920 cannot admit or deny the allegations in Paragraph 281 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 281.

282. 18920 cannot admit or deny the allegations in Paragraph 282 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 282.



283. 18920 cannot admit or deny the allegations in Paragraph 283 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 283.

284. 18920 cannot admit or deny the allegations in Paragraph 284 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 284.

285. 18920 cannot admit or deny the allegations in Paragraph 285 to the extent the allegations are directed at another party. 18920 denies the allegations directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 285.

286. 18920 cannot admit or deny the allegations in Paragraph 286 to the extent the allegations are directed at another party. 18920 denies the allegations directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 286.

287. 18920 denies the allegations in Paragraph 287.

288. 18920 cannot admit or deny the allegations in Paragraph 288 to the extent the allegations are directed at another party. 18920 denies the allegations directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 288.

289. 18920 denies the allegations in Paragraph 289.

290. 18920 denies the allegations in Paragraph 290.

291. 18920 cannot admit or deny the allegations in Paragraph 291 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 291.

292. 18920 cannot admit or deny the allegations in Paragraph 292 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 292.

293. 18920 cannot admit or deny the allegations in Paragraph 293 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 293.

294. 18920 cannot admit or deny the allegations in Paragraph 294 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 294.

295. 18920 cannot admit or deny the allegations in Paragraph 295 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 295.

296. 18920 cannot admit or deny the allegations in Paragraph 296 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 296.

297. 18920 cannot admit or deny the allegations in Paragraph 297 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 297.

298. 18920 cannot admit or deny the allegations in Paragraph 298 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 298.

299. 18920 cannot admit or deny the allegations in Paragraph 299 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 299.

300. 18920 cannot admit or deny the allegations in Paragraph 300 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 300.

301. 18920 cannot admit or deny the allegations in Paragraph 301 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 301.

302. 18920 cannot admit or deny the allegations in Paragraph 302 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 302.

303. 18920 cannot admit or deny the allegations in Paragraph 303 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 303.

304. 18920 cannot admit or deny the allegations in Paragraph 304 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 304.

305. 18920 cannot admit or deny the allegations in Paragraph 305 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 305.

306. 18920 cannot admit or deny the allegations in Paragraph 306 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 306.

307. 18920 cannot admit or deny the allegations in Paragraph 307 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 307.

308. 18920 cannot admit or deny the allegations in Paragraph 308 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 308.

309. 18920 cannot admit or deny the allegations in Paragraph 309 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 309.

310. 18920 cannot admit or deny the allegations in Paragraph 310 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 310.

311. 18920 cannot admit or deny the allegations in Paragraph 311 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 311.

312. 18920 cannot admit or deny the allegations in Paragraph 312 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 312.

313. 18920 cannot admit or deny the allegations in Paragraph 313 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 313.

314. 18920 cannot admit or deny the allegations in Paragraph 314 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 314.

315. 18920 cannot admit or deny the allegations in Paragraph 315 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 315.

316. 18920 cannot admit or deny the allegations in Paragraph 316 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 316.

317. 18920 cannot admit or deny the allegations in Paragraph 317 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 317.

318. 18920 cannot admit or deny the allegations in Paragraph 318 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 318.

319. 18920 cannot admit or deny the allegations in Paragraph 319 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 319.

320. 18920 cannot admit or deny the allegations in Paragraph 320 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 320.

321. 18920 cannot admit or deny the allegations in Paragraph 321 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 321.

322. 18920 cannot admit or deny the allegations in Paragraph 322 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 322.

323. 18920 cannot admit or deny the allegations in Paragraph 323 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 323.

324. 18920 cannot admit or deny the allegations in Paragraph 324 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 324.

325. 18920 cannot admit or deny the allegations in Paragraph 325 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 325.

326. 18920 cannot admit or deny the allegations in Paragraph 326 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 326.

327. 18920 cannot admit or deny the allegations in Paragraph 327 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 327.

328. 18920 cannot admit or deny the allegations in Paragraph 328 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 328.

329. 18920 cannot admit or deny the allegations in Paragraph 329 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 329.

330. 18920 cannot admit or deny the allegations in Paragraph 330 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 330.

331. 18920 cannot admit or deny the allegations in Paragraph 331 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 331.

332. 18920 cannot admit or deny the allegations in Paragraph 332 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 332.



333. 18920 cannot admit or deny the allegations in Paragraph 333 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 333.

334. 18920 cannot admit or deny the allegations in Paragraph 334 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 334.

335. 18920 cannot admit or deny the allegations in Paragraph 335 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 335.

336. 18920 cannot admit or deny the allegations in Paragraph 336 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 336.

337. 18920 cannot admit or deny the allegations in Paragraph 337 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 337.

338. 18920 cannot admit or deny the allegations in Paragraph 338 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 338.

339. 18920 cannot admit or deny the allegations in Paragraph 339 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 339.

340. 18920 cannot admit or deny the allegations in Paragraph 340 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 340.

341. 18920 cannot admit or deny the allegations in Paragraph 341 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 341.

342. 18920 cannot admit or deny the allegations in Paragraph 342 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 342.

343. 18920 cannot admit or deny the allegations in Paragraph 343 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 343.

344. 18920 cannot admit or deny the allegations in Paragraph 344 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 344.

345. 18920 cannot admit or deny the allegations in Paragraph 345 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 345.

346. 18920 cannot admit or deny the allegations in Paragraph 346 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 346.

347. 18920 cannot admit or deny the allegations in Paragraph 347 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 347.

348. 18920 cannot admit or deny the allegations in Paragraph 348 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 348.

349. 18920 cannot admit or deny the allegations in Paragraph 349 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 349.

350. 18920 cannot admit or deny the allegations in Paragraph 350 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 350.

351. 18920 cannot admit or deny the allegations in Paragraph 351 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 351.

352. 18920 admits that it purchased preferred shares of Goodman Networks from James Goodman-controlled entities, but otherwise denies the allegations in Paragraph 352.

353. 18920 admits that it purchased shares of preferred stock of Goodman Networks from James Goodman-controlled entities, but otherwise denies the allegations in Paragraph 352.

354. The first sentence of Paragraph 354 is vague and ambiguous, in that it does not identify what document it is referring to with the quoted language, and therefore this sentence cannot be admitted or denied. To the extent an admission or denial is required, 18920 denies the first sentence of Paragraph 354. The remainder of the allegations in Paragraph 354 are denied.

355. 18920 cannot admit or deny the allegations in Paragraph 355 as the allegations are vague and ambiguous. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 355.

356. 18920 admits that it purchased shares of preferred stock of Goodman Networks from James Goodman-controlled entities, but otherwise denies the allegations in Paragraph 356.

357. 18920 denies the allegations in Paragraph 357.

358. 18920 cannot admit or deny the allegations in Paragraph 358 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 358.

359. 18920 cannot admit or deny the allegations in Paragraph 359 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 359.

360. 18920 cannot admit or deny the allegations in Paragraph 360 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 360.

361. 18920 admits that Steven Zakharyayev and Jim Frinzi communicated by phone on March 9, 2022, and that Steven Zakharyayev wrote the quoted language in an email. Paragraph 361 is otherwise denied.

362. 18920 admits that it made a demand to Goodman Networks on March 9, 2022 for a mandatory redemption of its preferred shares in Goodman Networks. 18920 otherwise denies the allegations in Paragraph 362.

363. 18920 denies the allegations in Paragraph 363.

364. 18920 denies the allegations in Paragraph 364.

365. 18920 admits that it redeemed the preferred shares to Goodman Networks. 18920 otherwise denies the allegations in Paragraph 365.

366. 18920 denies the allegations in Paragraph 366.

367. 18920 denies the allegations in Paragraph 367.

368. The allegations contained in Paragraph 368 are too vague to be able to admit or deny. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 368.

369. 18920 denies the allegations in Paragraph 369.

370. 18920 denies the allegations in Paragraph 370.

371. 18920 admits the allegations in Paragraph 371.

372. 18920 denies the allegations in Paragraph 372.

373. 18920 denies the allegations in Paragraph 373.

374. 18920 denies the allegations in Paragraph 374.

375. 18920 admits that it entered into a Trademark Acquisition Agreement with American Metals Recovery and Recycling Inc. The Trademark Acquisition Agreement is the best source for what it says, and Paragraph 375's paraphrasing of the agreement is vague and ambiguous and therefore cannot be admitted or denied. 18920 denies that it was ever actually issued \$10,000 worth of preferred shares in AMRR.

376. 18920 denies the allegations in Paragraph 376.

377. 18920 cannot admit or deny the allegations in Paragraph 377 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 377.

378. 18920 denies the allegations in Paragraph 378.

379. 18920 denies the allegations in Paragraph 379.

380. 18920 cannot admit or deny the allegations in Paragraph 380 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 380.

381. 18920 cannot admit or deny the allegations in Paragraph 381 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 381.

382. 18920 cannot admit or deny the allegations in Paragraph 382 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 382.

383. 18920 cannot admit or deny the allegations in Paragraph 383 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 383.

384. 18920 cannot admit or deny the allegations in Paragraph 384 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 384.

385. 18920 cannot admit or deny the allegations in Paragraph 385 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 385.

386. 18920 cannot admit or deny the allegations in Paragraph 386 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 386.

387. 18920 cannot admit or deny the allegations in Paragraph 387 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 387.

388. 18920 cannot admit or deny the allegations in Paragraph 388 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 389.

389. 18920 cannot admit or deny the allegations in Paragraph 390 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 390.

390. 18920 cannot admit or deny the allegations in Paragraph 391 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 390.

391. 18920 cannot admit or deny the allegations in Paragraph 391 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 391.



392. 18920 cannot admit or deny the allegations in Paragraph 392 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 392.

393. 18920 cannot admit or deny the allegations in Paragraph 393 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 393.

394. 18920 cannot admit or deny the allegations in Paragraph 394 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 394.

395. 18920 cannot admit or deny the allegations in Paragraph 395 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 395.

396. 18920 cannot admit or deny the allegations in Paragraph 396 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 396.

397. 18920 cannot admit or deny the allegations in Paragraph 397 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 397.

398. 18920 cannot admit or deny the allegations in Paragraph 398 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 398.

399. 18920 cannot admit or deny the allegations in Paragraph 399 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 399.

400. 18920 cannot admit or deny the allegations in Paragraph 400 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 400.

401. 18920 cannot admit or deny the allegations in Paragraph 401 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 401.

402. 18920 cannot admit or deny the allegations in Paragraph 402 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 402.

403. 18920 cannot admit or deny the allegations in Paragraph 403 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 403.

404. 18920 cannot admit or deny the allegations in Paragraph 404 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 404.

405. 18920 cannot admit or deny the allegations in Paragraph 405 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 405.

406. 18920 cannot admit or deny the allegations in Paragraph 406 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 406.

407. 18920 cannot admit or deny the allegations in Paragraph 407 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 407.

408. 18920 cannot admit or deny the allegations in Paragraph 408 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 408.

409. 18920 cannot admit or deny the allegations in Paragraph 409 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 409.

410. 18920 cannot admit or deny the allegations in Paragraph 410 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 410.

411. 18920 cannot admit or deny the allegations in Paragraph 411 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 411.

412. 18920 cannot admit or deny the allegations in Paragraph 412 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 412.

413. 18920 cannot admit or deny the allegations in Paragraph 413 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 413.

414. 18920 cannot admit or deny the allegations in Paragraph 414 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 414.

415. 18920 cannot admit or deny the allegations in Paragraph 415 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 415.

416. 18920 cannot admit or deny the allegations in Paragraph 416 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 416.

417. 18920 cannot admit or deny the allegations in Paragraph 417 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 417.

418. 18920 cannot admit or deny the allegations in Paragraph 418 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 418.

419. 18920 cannot admit or deny the allegations in Paragraph 419 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 419.

420. 18920 cannot admit or deny the allegations in Paragraph 420 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 420.

421. 18920 cannot admit or deny the allegations in Paragraph 421 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 421.

422. 18920 cannot admit or deny the allegations in Paragraph 422 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 422.

423. 18920 cannot admit or deny the allegations in Paragraph 423 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 423.

424. 18920 cannot admit or deny the allegations in Paragraph 424 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 424.

425. 18920 cannot admit or deny the allegations in Paragraph 425 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 425.

426. 18920 cannot admit or deny the allegations in Paragraph 426 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 426.

427. 18920 cannot admit or deny the allegations in Paragraph 427 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 427.

428. 18920 cannot admit or deny the allegations in Paragraph 428 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 428.

429. 18920 cannot admit or deny the allegations in Paragraph 429 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 429.

430. 18920 cannot admit or deny the allegations in Paragraph 430 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 430.

431. 18920 cannot admit or deny the allegations in Paragraph 431 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 431.

432. 18920 cannot admit or deny the allegations in Paragraph 432 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 432.

433. 18920 cannot admit or deny the allegations in Paragraph 433 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 433.

434. 18920 cannot admit or deny the allegations in Paragraph 434 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 434.

435. 18920 cannot admit or deny the allegations in Paragraph 435 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 435.

436. 18920 cannot admit or deny the allegations in Paragraph 436 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 436.

437. 18920 cannot admit or deny the allegations in Paragraph 437 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 437.

438. 18920 cannot admit or deny the allegations in Paragraph 438 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 438.

439. 18920 cannot admit or deny the allegations in Paragraph 439 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 439.



440. 18920 cannot admit or deny the allegations in Paragraph 440 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 440.

441. 18920 cannot admit or deny the allegations in Paragraph 441 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 441.

442. 18920 cannot admit or deny the allegations in Paragraph 442 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 442.

443. 18920 cannot admit or deny the allegations in Paragraph 443 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 443.

444. 18920 cannot admit or deny the allegations in Paragraph 444 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 444.

445. 18920 cannot admit or deny the allegations in Paragraph 445 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 445.

446. 18920 cannot admit or deny the allegations in Paragraph 446 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 446.

447. 18920 cannot admit or deny the allegations in Paragraph 447 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 447.

448. 18920 cannot admit or deny the allegations in Paragraph 448 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 448.

449. 18920 cannot admit or deny the allegations in Paragraph 449 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 449.

450. 18920 cannot admit or deny the allegations in Paragraph 450 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 450.

451. 18920 cannot admit or deny the allegations in Paragraph 451 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 451.

452. 18920 cannot admit or deny the allegations in Paragraph 452 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 452.

453. 18920 cannot admit or deny the allegations in Paragraph 453 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 453.

454. 18920 cannot admit or deny the allegations in Paragraph 454 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 454.

455. 18920 cannot admit or deny the allegations in Paragraph 455 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 455.

456. 18920 cannot admit or deny the allegations in Paragraph 456 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 456.

457. 18920 cannot admit or deny the allegations in Paragraph 457 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 457.

458. 18920 cannot admit or deny the allegations in Paragraph 458 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 458.

459. 18920 cannot admit or deny the allegations in Paragraph 459 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 459.

460. 18920 cannot admit or deny the allegations in Paragraph 460 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 460.

461. 18920 cannot admit or deny the allegations in Paragraph 461 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 461.

462. 18920 cannot admit or deny the allegations in Paragraph 462 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 462.

463. 18920 cannot admit or deny the allegations in Paragraph 463 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 463.

464. 18920 cannot admit or deny the allegations in Paragraph 464 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 464.

465. 18920 cannot admit or deny the allegations in Paragraph 465 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 465.

466. 18920 cannot admit or deny the allegations in Paragraph 466 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 466.

467. 18920 cannot admit or deny the allegations in Paragraph 467 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 467.

468. 18920 cannot admit or deny the allegations in Paragraph 468 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 468.

469. 18920 cannot admit or deny the allegations in Paragraph 469 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 469.

470. 18920 cannot admit or deny the allegations in Paragraph 470 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 470.

471. 18920 cannot admit or deny the allegations in Paragraph 471 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 471.

472. 18920 cannot admit or deny the allegations in Paragraph 472 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 472.

473. 18920 cannot admit or deny the allegations in Paragraph 473 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 473.

474. 18920 cannot admit or deny the allegations in Paragraph 474 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 474.

475. 18920 cannot admit or deny the allegations in Paragraph 475 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 475.

476. 18920 cannot admit or deny the allegations in Paragraph 476 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 476.

477. 18920 cannot admit or deny the allegations in Paragraph 477 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 477.

478. 18920 cannot admit or deny the allegations in Paragraph 478 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 478.

#### **CAUSES OF ACTION**

##### **Cause No. 1 – Violation of Civil R.I.C.O. 18 U.S.C. § 1961 et seq.**

479. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

480. 18920 cannot admit or deny the allegations in Paragraph 480 as it calls for a legal conclusion. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 480.

481. 18920 cannot admit or deny the allegations in Paragraph 481 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent

directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 481.

482. 18920 cannot admit or deny the allegations in Paragraph 482 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 482.

483. 18920 cannot admit or deny the allegations in Paragraph 483 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 483.

484. 18920 cannot admit or deny the allegations in Paragraph 484 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 484.

485. 18920 cannot admit or deny the allegations in Paragraph 485 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 485.

486. 18920 cannot admit or deny the allegations in Paragraph 486 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 486.



487. 18920 cannot admit or deny the allegations in Paragraph 487 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 487.

488. 18920 cannot admit or deny the allegations in Paragraph 488 as the allegations are directed at another party and are too vague to admit or deny. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 488.

489. 18920 cannot admit or deny the allegations in Paragraph 489 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 489.

490. 18920 cannot admit or deny the allegations in Paragraph 490 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 490.

491. 18920 cannot admit or deny the allegations in Paragraph 491 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 491.

492. 18920 cannot admit or deny the allegations in Paragraph 492 as the allegations are directed at another party and are too vague to admit or deny. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 492.

493. 18920 cannot admit or deny the allegations in Paragraph 493 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 493.

494. 18920 cannot admit or deny the allegations in Paragraph 494 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 494.

495. 18920 cannot admit or deny the allegations in Paragraph 495 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 495.

496. 18920 cannot admit or deny the allegations in Paragraph 496 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 496.

497. 18920 cannot admit or deny the allegations in Paragraph 497 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 497.

498. 18920 cannot admit or deny the allegations in Paragraph 498 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 498.

499. 18920 cannot admit or deny the allegations in Paragraph 499 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 499.

500. 18920 denies the allegations in Paragraph 500.

501. 18920 cannot admit or deny the allegations in Paragraph 501 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 501.

502. 18920 cannot admit or deny the allegations in Paragraph 502 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 502.

503. 18920 cannot admit or deny the allegations in Paragraph 503 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 503.

504. 18920 cannot admit or deny the allegations in Paragraph 504 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 504.

505. 18920 cannot admit or deny the allegations in Paragraph 505 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 505.

506. 18920 cannot admit or deny the allegations in Paragraph 506 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 506.

507. 18920 cannot admit or deny the allegations in Paragraph 507 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 507.

508. 18920 cannot admit or deny the allegations in Paragraph 508 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 508.

509. 18920 cannot admit or deny the allegations in Paragraph 509 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 509.

510. 18920 cannot admit or deny the allegations in Paragraph 510 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 510.

511. 18920 cannot admit or deny the allegations in Paragraph 511 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 511.

512. 18920 cannot admit or deny the allegations in Paragraph 512 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 512.

513. 18920 cannot admit or deny the allegations in Paragraph 513 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 513.

514. 18920 cannot admit or deny the allegations in Paragraph 514 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 514.

515. 18920 cannot admit or deny the allegations in Paragraph 515 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 515.

516. 18920 cannot admit or deny the allegations in Paragraph 516 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 516.

517. 18920 cannot admit or deny the allegations in Paragraph 517 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 517.

518. 18920 cannot admit or deny the allegations in Paragraph 518 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 518.

519. 18920 cannot admit or deny the allegations in Paragraph 519 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 519.

520. 18920 cannot admit or deny the allegations in Paragraph 520 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 520.

521. 18920 cannot admit or deny the allegations in Paragraph 521 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 521.

522. 18920 cannot admit or deny the allegations in Paragraph 522 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 522.

523. 18920 cannot admit or deny the allegations in Paragraph 523 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 523.

524. 18920 cannot admit or deny the allegations in Paragraph 524 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 524.

525. 18920 cannot admit or deny the allegations in Paragraph 525 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 525.

526. 18920 cannot admit or deny the allegations in Paragraph 526 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 526.

527. 18920 cannot admit or deny the allegations in Paragraph 527 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 527.

528. 18920 cannot admit or deny the allegations in Paragraph 528 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 528.

529. 18920 cannot admit or deny the allegations in Paragraph 529 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 529.

530. 18920 cannot admit or deny the allegations in Paragraph 530 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 530.

531. 18920 cannot admit or deny the allegations in Paragraph 531 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 531.

532. 18920 cannot admit or deny the allegations in Paragraph 532 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 532.

533. 18920 cannot admit or deny the allegations in Paragraph 533 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 533.

534. 18920 cannot admit or deny the allegations in Paragraph 534 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 534.



535. 18920 cannot admit or deny the allegations in Paragraph 535 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 535.

536. 18920 denies the allegations in Paragraph 536.

537. 18920 denies the allegations in Paragraph 537.

538. 18920 denies the allegations in Paragraph 538.

539. The allegations in Paragraph 539 are too vague to admit or deny, and therefore 18920 denies the allegations in Paragraph 539.

540. Paragraph 540 contains only a legal conclusion which cannot be admitted or denied. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 540.

541. The allegations in Paragraph 541 are too vague to admit or deny, and therefore 18920 denies the allegations in Paragraph 541.

542. 18920 denies the allegations in Paragraph 542.

543. 18920 cannot admit or deny the allegations in Paragraph 543 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 543.

544. 18920 cannot admit or deny the allegations in Paragraph 544 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 544.

545. 18920 cannot admit or deny the allegations in Paragraph 545 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 545.

546. 18920 cannot admit or deny the allegations in Paragraph 546 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 546.

547. 18920 cannot admit or deny the allegations in Paragraph 547 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 547.

548. 18920 cannot admit or deny the allegations in Paragraph 548 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 548.

549. 18920 cannot admit or deny the allegations in Paragraph 549 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 549.

550. 18920 cannot admit or deny the allegations in Paragraph 550 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 550.

551. 18920 cannot admit or deny the allegations in Paragraph 551 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 551.

552. 18920 cannot admit or deny the allegations in Paragraph 552 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 552.

**18 U.S.C. § 1962(c) – Predicate Acts**

553. 18920 cannot admit or deny the allegations in Paragraph 553 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 553.

554. 18920 cannot admit or deny the allegations in Paragraph 554 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 554.

555. 18920 cannot admit or deny the allegations in Paragraph 555 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 555.

556. 18920 cannot admit or deny the allegations in Paragraph 556 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent

directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 556.

557. 18920 cannot admit or deny the allegations in Paragraph 557 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 557.

558. 18920 cannot admit or deny the allegations in Paragraph 558 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 558.

559. 18920 cannot admit or deny the allegations in Paragraph 559 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 559.

560. 18920 cannot admit or deny the allegations in Paragraph 560 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 560.

561. 18920 cannot admit or deny the allegations in Paragraph 561 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 561.

562. 18920 cannot admit or deny the allegations in Paragraph 562 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 562.

563. 18920 cannot admit or deny the allegations in Paragraph 563 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 563.

564. 18920 cannot admit or deny the allegations in Paragraph 564 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 564.

565. 18920 cannot admit or deny the allegations in Paragraph 565 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 565.

566. 18920 cannot admit or deny the allegations in Paragraph 566 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 566.

567. 18920 cannot admit or deny the allegations in Paragraph 567 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 567.

568. 18920 cannot admit or deny the allegations in Paragraph 568 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 568.

569. 18920 cannot admit or deny the allegations in Paragraph 569 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 569.

570. 18920 cannot admit or deny the allegations in Paragraph 570 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 570.

571. 18920 cannot admit or deny the allegations in Paragraph 571 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 571.

572. 18920 cannot admit or deny the allegations in Paragraph 572 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 572.

573. 18920 cannot admit or deny the allegations in Paragraph 573 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 573.

574. 18920 cannot admit or deny the allegations in Paragraph 574 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 574.

575. 18920 cannot admit or deny the allegations in Paragraph 575 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 575.

576. 18920 cannot admit or deny the allegations in Paragraph 576 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 576.

577. 18920 cannot admit or deny the allegations in Paragraph 577 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 577.

578. 18920 cannot admit or deny the allegations in Paragraph 578 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 578.

579. 18920 cannot admit or deny the allegations in Paragraph 579 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 579.

580. 18920 cannot admit or deny the allegations in Paragraph 580 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent

directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 580.

581. 18920 cannot admit or deny the allegations in Paragraph 581 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 581.

582. 18920 cannot admit or deny the allegations in Paragraph 582 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 582.

583. 18920 cannot admit or deny the allegations in Paragraph 583 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 583.

584. 18920 cannot admit or deny the allegations in Paragraph 584 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 584.

585. 18920 cannot admit or deny the allegations in Paragraph 585 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 585.



586. 18920 cannot admit or deny the allegations in Paragraph 586 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 586.

587. 18920 cannot admit or deny the allegations in Paragraph 587 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 587.

588. 18920 cannot admit or deny the allegations in Paragraph 588 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 588.

589. 18920 cannot admit or deny the allegations in Paragraph 589 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 589.

590. 18920 cannot admit or deny the allegations in Paragraph 590 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 590.

591. 18920 cannot admit or deny the allegations in Paragraph 591 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 591.

592. 18920 cannot admit or deny the allegations in Paragraph 592 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 592.

593. 18920 cannot admit or deny the allegations in Paragraph 593 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 593.

594. 18920 cannot admit or deny the allegations in Paragraph 594 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 594.

595. 18920 cannot admit or deny the allegations in Paragraph 595 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 595.

596. 18920 cannot admit or deny the allegations in Paragraph 596 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 596.

597. 18920 cannot admit or deny the allegations in Paragraph 597 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 597.

598. 18920 cannot admit or deny the allegations in Paragraph 598 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 598.

599. 18920 cannot admit or deny the allegations in Paragraph 599 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 599.

600. 18920 cannot admit or deny the allegations in Paragraph 600 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 600.

601. 18920 cannot admit or deny the allegations in Paragraph 601 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 601.

602. 18920 cannot admit or deny the allegations in Paragraph 602 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 602.

603. 18920 cannot admit or deny the allegations in Paragraph 603 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 603.

604. 18920 cannot admit or deny the allegations in Paragraph 604 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 604.

605. 18920 cannot admit or deny the allegations in Paragraph 605 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 605.

606. 18920 cannot admit or deny the allegations in Paragraph 606 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 606.

607. 18920 cannot admit or deny the allegations in Paragraph 607 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 607.

608. 18920 cannot admit or deny the allegations in Paragraph 608 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 608.

609. 18920 cannot admit or deny the allegations in Paragraph 609 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 609.

610. 18920 cannot admit or deny the allegations in Paragraph 610 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 610.

611. 18920 cannot admit or deny the allegations in Paragraph 611 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 611.

612. 18920 cannot admit or deny the allegations in Paragraph 612 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 612.

613. 18920 cannot admit or deny the allegations in Paragraph 613 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 613.

614. 18920 cannot admit or deny the allegations in Paragraph 614 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 614.

615. 18920 cannot admit or deny the allegations in Paragraph 615 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 615.

616. 18920 cannot admit or deny the allegations in Paragraph 616 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 616.

617. 18920 cannot admit or deny the allegations in Paragraph 617 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 617.

618. 18920 cannot admit or deny the allegations in Paragraph 618 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 618.

619. 18920 cannot admit or deny the allegations in Paragraph 619 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 619.

620. 18920 cannot admit or deny the allegations in Paragraph 620 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent

directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 620.

621. 18920 cannot admit or deny the allegations in Paragraph 621 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 621.

622. 18920 cannot admit or deny the allegations in Paragraph 622 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 622.

623. 18920 cannot admit or deny the allegations in Paragraph 623 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 623.

624. 18920 denies the allegations in Paragraph 624.

625. 18920 cannot admit or deny the allegations in Paragraph 625 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 625.

626. 18920 cannot admit or deny the allegations in Paragraph 626 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 626.

627. 18920 cannot admit or deny the allegations in Paragraph 627 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 627.

628. 18920 cannot admit or deny the allegations in Paragraph 628 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 628.

629. 18920 cannot admit or deny the allegations in Paragraph 629 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 629.

630. 18920 cannot admit or deny the allegations in Paragraph 630 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 630.

631. 18920 cannot admit or deny the allegations in Paragraph 631 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 631.



632. 18920 cannot admit or deny the allegations in Paragraph 632 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 632.

633. 18920 cannot admit or deny the allegations in Paragraph 633 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 633.

634. 18920 cannot admit or deny the allegations in Paragraph 634 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 634.

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635. 18920 cannot admit or deny the allegations in Paragraph 635 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 635.

636. 18920 cannot admit or deny the allegations in Paragraph 636 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 636.

637. 18920 cannot admit or deny the allegations in Paragraph 637 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 637.

638. 18920 cannot admit or deny the allegations in Paragraph 638 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 638.

639. 18920 cannot admit or deny the allegations in Paragraph 639 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 639.

640. 18920 cannot admit or deny the allegations in Paragraph 640 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 640.

641. 18920 cannot admit or deny the allegations in Paragraph 641 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 641.

642. 18920 cannot admit or deny the allegations in Paragraph 642 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 642.

643. 18920 cannot admit or deny the allegations in Paragraph 643 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 643.

644. 18920 cannot admit or deny the allegations in Paragraph 644 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 644.

645. 18920 cannot admit or deny the allegations in Paragraph 645 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 645.

646. 18920 cannot admit or deny the allegations in Paragraph 646 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 646.

647. 18920 cannot admit or deny the allegations in Paragraph 647 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 647.

648. 18920 denies the allegations in Paragraph 648.

649. 18920 denies the allegations in Paragraph 649.

650. 18920 denies the allegations in Paragraph 650.

**Cause No. 2 – Theft (Embezzlement) Pursuant to Texas Theft Liability Act**

**Tex. Civ. Prac. & Rem. Code § 134.003 - .005**

651. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

652. 18920 cannot admit or deny the allegations in Paragraph 652 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 652.

653. 18920 cannot admit or deny the allegations in Paragraph 653 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 653.

654. 18920 cannot admit or deny the allegations in Paragraph 654 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 654.

655. 18920 cannot admit or deny the allegations in Paragraph 655 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 655.

656. 18920 cannot admit or deny the allegations in Paragraph 656 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 656.

657. 18920 cannot admit or deny the allegations in Paragraph 657 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 657.

658. 18920 cannot admit or deny the allegations in Paragraph 658 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 658.

659. 18920 cannot admit or deny the allegations in Paragraph 659 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 659.

660. 18920 cannot admit or deny the allegations in Paragraph 660 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 660.

661. 18920 cannot admit or deny the allegations in Paragraph 661 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 661.

662. 18920 cannot admit or deny the allegations in Paragraph 662 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 662.

663. 18920 cannot admit or deny the allegations in Paragraph 663 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 663.

664. 18920 cannot admit or deny the allegations in Paragraph 664 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 664.

665. 18920 cannot admit or deny the allegations in Paragraph 665 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 665.

666. 18920 cannot admit or deny the allegations in Paragraph 666 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 666.

667. 18920 cannot admit or deny the allegations in Paragraph 667 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 667.

668. 18920 cannot admit or deny the allegations in Paragraph 668 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 668.

669. 18920 cannot admit or deny the allegations in Paragraph 669 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 669.

670. 18920 denies the allegations in Paragraph 670.

**Cause No. 3 – Common Law Theft/Embezzlement/Conversion**

**Against All Defendants**

671. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

672. 18920 cannot admit or deny the allegations in Paragraph 672 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 672.

673. 18920 cannot admit or deny the allegations in Paragraph 673 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 673.

674. 18920 cannot admit or deny the allegations in Paragraph 674 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 674.

675. 18920 cannot admit or deny the allegations in Paragraph 675 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 675.

676. 18920 cannot admit or deny the allegations in Paragraph 676 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 676.

677. 18920 cannot admit or deny the allegations in Paragraph 677 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 677.

678. 18920 cannot admit or deny the allegations in Paragraph 678 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 678.

679. 18920 cannot admit or deny the allegations in Paragraph 679 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 679.



680. 18920 cannot admit or deny the allegations in Paragraph 680 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 680.

681. 18920 cannot admit or deny the allegations in Paragraph 681 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 681.

682. 18920 cannot admit or deny the allegations in Paragraph 682 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 682.

683. 18920 cannot admit or deny the allegations in Paragraph 683 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 683.

684. 18920 cannot admit or deny the allegations in Paragraph 684 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 684.

685. 18920 denies the allegations in Paragraph 685.

686. 18920 denies the allegations in Paragraph 686.

**Cause No. 4 – Common Law Unjust Enrichment**

**Against All Defendants**

687. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

688. 18920 cannot admit or deny the allegations in Paragraph 688 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 688.

689. 18920 cannot admit or deny the allegations in Paragraph 689 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 689.

690. 18920 cannot admit or deny the allegations in Paragraph 690 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 690.

691. 18920 cannot admit or deny the allegations in Paragraph 691 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 691.

692. 18920 cannot admit or deny the allegations in Paragraph 692 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 692.

693. 18920 cannot admit or deny the allegations in Paragraph 693 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 693.

694. 18920 cannot admit or deny the allegations in Paragraph 694 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 694.

695. 18920 cannot admit or deny the allegations in Paragraph 695 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 695.

696. 18920 cannot admit or deny the allegations in Paragraph 696 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 696.

697. 18920 cannot admit or deny the allegations in Paragraph 697 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent

directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 697.

698. 18920 cannot admit or deny the allegations in Paragraph 698 to the extent the allegations are directed at another party. 18920 denies the allegations to the extent directed at it. To the extent an admission or denial is otherwise required, 18920 denies the allegations in Paragraph 698.

699. 18920 denies the allegations in Paragraph 699.

700. 18920 denies the allegations in Paragraph 700.

**Cause No. 5 – Common Law Fraud or Constructive Fraud  
Against Frinzi and James Goodman  
And all Defendants which Received the Fraudulently Obtained Funds**

701. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

702. 18920 cannot admit or deny the allegations in Paragraph 702 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 702.

703. 18920 cannot admit or deny the allegations in Paragraph 703 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 703.

704. 18920 cannot admit or deny the allegations in Paragraph 704 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 704.

705. 18920 cannot admit or deny the allegations in Paragraph 705 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 705.

706. 18920 cannot admit or deny the allegations in Paragraph 706 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 706.

707. 18920 cannot admit or deny the allegations in Paragraph 707 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 707.

708. 18920 cannot admit or deny the allegations in Paragraph 708 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 708.

709. 18920 cannot admit or deny the allegations in Paragraph 709 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 709.

710. 18920 cannot admit or deny the allegations in Paragraph 710 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 710.

711. 18920 cannot admit or deny the allegations in Paragraph 711 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 711.

712. 18920 cannot admit or deny the allegations in Paragraph 712 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 712.

713. 18920 cannot admit or deny the allegations in Paragraph 713 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 713.

714. 18920 cannot admit or deny the allegations in Paragraph 714 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 714.

715. 18920 cannot admit or deny the allegations in Paragraph 715 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 715.

716. 18920 cannot admit or deny the allegations in Paragraph 716 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 716.

717. 18920 cannot admit or deny the allegations in Paragraph 717 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 717.

718. 18920 cannot admit or deny the allegations in Paragraph 718 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 718.

719. 18920 cannot admit or deny the allegations in Paragraph 719 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 719.

720. 18920 cannot admit or deny the allegations in Paragraph 720 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 720.

721. 18920 cannot admit or deny the allegations in Paragraph 721 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 721.

722. 18920 cannot admit or deny the allegations in Paragraph 722 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 722.

723. 18920 cannot admit or deny the allegations in Paragraph 723 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 723.

724. 18920 cannot admit or deny the allegations in Paragraph 724 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 724.

725. 18920 cannot admit or deny the allegations in Paragraph 725 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 725.

726. 18920 cannot admit or deny the allegations in Paragraph 726 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 726.

727. 18920 cannot admit or deny the allegations in Paragraph 727 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 727.



728. 18920 cannot admit or deny the allegations in Paragraph 728 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 728.

729. 18920 cannot admit or deny the allegations in Paragraph 729 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 729.

730. 18920 cannot admit or deny the allegations in Paragraph 730 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 730.

731. 18920 cannot admit or deny the allegations in Paragraph 731 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 731.

732. 18920 denies the allegations in Paragraph 732.

#### **Cause No. 6 – Tortious Interference**

##### **Against Frinzi, James Goodman and Prosperity Bank**

733. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

734. 18920 cannot admit or deny the allegations in Paragraph 734 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 734.

735. 18920 cannot admit or deny the allegations in Paragraph 735 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 735.

736. 18920 cannot admit or deny the allegations in Paragraph 736 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 736.

737. 18920 cannot admit or deny the allegations in Paragraph 737 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 737.

738. 18920 cannot admit or deny the allegations in Paragraph 738 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 738.

739. 18920 cannot admit or deny the allegations in Paragraph 739 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 739.

740. 18920 cannot admit or deny the allegations in Paragraph 740 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 740.

741. 18920 cannot admit or deny the allegations in Paragraph 741 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 741.

742. 18920 cannot admit or deny the allegations in Paragraph 742 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 742.

743. 18920 cannot admit or deny the allegations in Paragraph 743 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 743.

744. 18920 cannot admit or deny the allegations in Paragraph 744 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 745.

745. 18920 cannot admit or deny the allegations in Paragraph 746 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 745.

746. 18920 cannot admit or deny the allegations in Paragraph 746 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 746.

747. 18920 cannot admit or deny the allegations in Paragraph 747 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 747.

748. 18920 cannot admit or deny the allegations in Paragraph 748 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 748.

749. 18920 cannot admit or deny the allegations in Paragraph 749 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 749.

750. 18920 cannot admit or deny the allegations in Paragraph 750 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 750.

751. 18920 cannot admit or deny the allegations in Paragraph 751 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 751.

752. 18920 cannot admit or deny the allegations in Paragraph 752 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 752.

753. 18920 cannot admit or deny the allegations in Paragraph 753 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 753.

754. 18920 cannot admit or deny the allegations in Paragraph 754 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 754.

755. 18920 cannot admit or deny the allegations in Paragraph 755 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 755.

756. 18920 cannot admit or deny the allegations in Paragraph 756 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 756.

757. 18920 cannot admit or deny the allegations in Paragraph 757 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 757.

758. 18920 cannot admit or deny the allegations in Paragraph 758 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 758.

759. 18920 cannot admit or deny the allegations in Paragraph 759 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 759.

760. 18920 cannot admit or deny the allegations in Paragraph 760 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 760.

761. 18920 cannot admit or deny the allegations in Paragraph 761 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 761.

**Cause No. 7 – Civil Conspiracy**

**Against All Defendants**

762. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

763. 18920 cannot admit or deny the allegations in Paragraph 763 as it sets forth a legal conclusion to which no response is required. To the extent an admission or denial

is required, 18920 admits that FSCLE asserted such a claim but denies that the claim has any factual or legal validity.

764. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

765. 18920 cannot admit or deny the allegations in Paragraph 765 as it sets forth a legal conclusion to which no response is required. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 765.

766. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

767. 18920 denies the allegations in Paragraph 767.

768. 18920 denies the allegations in Paragraph 768.

769. 18920 denies the allegations in Paragraph 769.

#### **Cause No. 8 – Breach of Contract**

##### **Against Prosperity Bank**

770. 18920 admits or denies the facts alleged in the preceding paragraphs in accordance with its answer set forth above for the respective paragraph. Any factual allegation not expressly admitted is denied.

771. 18920 cannot admit or deny the allegations in Paragraph 771 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 771.

772. 18920 cannot admit or deny the allegations in Paragraph 772 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 772.

773. 18920 cannot admit or deny the allegations in Paragraph 773 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 773.

774. 18920 cannot admit or deny the allegations in Paragraph 774 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 774.

775. 18920 cannot admit or deny the allegations in Paragraph 775 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 775.

776. 18920 cannot admit or deny the allegations in Paragraph 776 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 776.



777. 18920 cannot admit or deny the allegations in Paragraph 777 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 777.

778. 18920 cannot admit or deny the allegations in Paragraph 778 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 778.

779. 18920 cannot admit or deny the allegations in Paragraph 779 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 779.

780. 18920 cannot admit or deny the allegations in Paragraph 780 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 780.

781. 18920 cannot admit or deny the allegations in Paragraph 781 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 781.

782. 18920 cannot admit or deny the allegations in Paragraph 782 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 782.

783. 18920 cannot admit or deny the allegations in Paragraph 783 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 783.

784. 18920 cannot admit or deny the allegations in Paragraph 784 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 784.

785. 18920 cannot admit or deny the allegations in Paragraph 785 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 785.

786. 18920 cannot admit or deny the allegations in Paragraph 786 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 786.

787. 18920 cannot admit or deny the allegations in Paragraph 787 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 787.

788. 18920 cannot admit or deny the allegations in Paragraph 788 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 788.

789. 18920 cannot admit or deny the allegations in Paragraph 789 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 789.

**Cause No. 9 – Negligence/Gross Negligence**

**Against Prosperity Bank**

790. 18920 cannot admit or deny the allegations in Paragraph 790 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 790.

791. 18920 cannot admit or deny the allegations in Paragraph 791 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 791.

792. 18920 cannot admit or deny the allegations in Paragraph 792 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 792.

793. 18920 cannot admit or deny the allegations in Paragraph 793 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 793.

794. 18920 cannot admit or deny the allegations in Paragraph 794 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 794.

795. 18920 cannot admit or deny the allegations in Paragraph 795 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 795.

796. 18920 cannot admit or deny the allegations in Paragraph 796 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 796.

797. 18920 cannot admit or deny the allegations in Paragraph 797 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 797.

798. 18920 cannot admit or deny the allegations in Paragraph 798 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 798.

799. 18920 cannot admit or deny the allegations in Paragraph 799 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 799.

800. 18920 cannot admit or deny the allegations in Paragraph 800 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 800.

801. 18920 cannot admit or deny the allegations in Paragraph 801 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 801.

802. 18920 cannot admit or deny the allegations in Paragraph 802 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 802.

803. 18920 cannot admit or deny the allegations in Paragraph 803 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 803.

804. 18920 cannot admit or deny the allegations in Paragraph 804 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 804.

805. 18920 cannot admit or deny the allegations in Paragraph 805 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 805.

806. 18920 cannot admit or deny the allegations in Paragraph 806 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 806.

807. 18920 cannot admit or deny the allegations in Paragraph 807 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 807.

808. 18920 cannot admit or deny the allegations in Paragraph 808 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 808.

809. 18920 cannot admit or deny the allegations in Paragraph 809 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 809.

810. 18920 cannot admit or deny the allegations in Paragraph 810 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 810.

811. 18920 cannot admit or deny the allegations in Paragraph 811 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 811.

812. 18920 cannot admit or deny the allegations in Paragraph 812 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 812.

813. 18920 cannot admit or deny the allegations in Paragraph 813 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 813.

814. 18920 cannot admit or deny the allegations in Paragraph 814 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 814.

**Cause No. 10 – Violation of UCC Article 4A**

**Tex. Bus. & Com. Code § 4A,202**

**Against Prosperity Bank**

815. 18920 cannot admit or deny the allegations in Paragraph 815 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 815.

816. 18920 cannot admit or deny the allegations in Paragraph 816 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 816.

817. 18920 cannot admit or deny the allegations in Paragraph 817 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 817.

818. 18920 cannot admit or deny the allegations in Paragraph 818 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 818.

819. 18920 cannot admit or deny the allegations in Paragraph 819 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 819.

820. 18920 cannot admit or deny the allegations in Paragraph 820 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 820.

821. 18920 cannot admit or deny the allegations in Paragraph 821 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 821.

822. 18920 cannot admit or deny the allegations in Paragraph 822 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 822.

823. 18920 cannot admit or deny the allegations in Paragraph 823 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 823.



824. 18920 cannot admit or deny the allegations in Paragraph 824 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 824.

825. 18920 cannot admit or deny the allegations in Paragraph 825 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 825.

826. 18920 cannot admit or deny the allegations in Paragraph 826 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 826.

827. 18920 cannot admit or deny the allegations in Paragraph 827 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 827.

828. 18920 cannot admit or deny the allegations in Paragraph 828 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 828.

829. 18920 cannot admit or deny the allegations in Paragraph 829 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 829.

830. 18920 cannot admit or deny the allegations in Paragraph 830 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 830.

831. 18920 cannot admit or deny the allegations in Paragraph 831 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 831.

832. 18920 cannot admit or deny the allegations in Paragraph 832 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 832.

833. 18920 cannot admit or deny the allegations in Paragraph 833 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 833.

834. 18920 cannot admit or deny the allegations in Paragraph 834 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 834.

835. 18920 cannot admit or deny the allegations in Paragraph 835 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 835.

836. 18920 cannot admit or deny the allegations in Paragraph 836 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 836.

837. 18920 cannot admit or deny the allegations in Paragraph 837 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 837.

838. 18920 cannot admit or deny the allegations in Paragraph 838 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 838.

839. 18920 cannot admit or deny the allegations in Paragraph 839 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 839.

840. 18920 cannot admit or deny the allegations in Paragraph 840 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 840.

841. 18920 cannot admit or deny the allegations in Paragraph 841 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 841.

842. 18920 cannot admit or deny the allegations in Paragraph 842 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 842.

843. 18920 cannot admit or deny the allegations in Paragraph 843 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 843.

844. 18920 cannot admit or deny the allegations in Paragraph 844 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 844.

845. 18920 cannot admit or deny the allegations in Paragraph 845 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 845.

846. 18920 cannot admit or deny the allegations in Paragraph 846 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 846.

847. 18920 cannot admit or deny the allegations in Paragraph 847 as the allegations are directed at another party. To the extent an admission or denial is required, 18920 denies the allegations in Paragraph 847.

**PRAYER FOR RELIEF**

The Prayer of Plaintiff's Third Amended Complaint does not include factual allegations for which a response is required. To the extent a response is deemed required, 18920 denies that the Plaintiff is entitled to the requested relief.

**18920's AFFIRMATIVE AND OTHER DEFENSES**

1. Plaintiff has failed to state a claim against 18920 upon which relief can be granted.
2. Plaintiff's claims are barred, in whole or in part, by the doctrine of laches, acquiescence, waiver, equitable estoppel, and unclean hands.
3. Plaintiff's claims are barred, in whole or in part, because Plaintiff lacks standing to bring these claims.
4. Plaintiff's claims are an impermissible violation of the automatic stay.
5. Plaintiff's claims are barred, in whole or in part, by the doctrine of ratification.
6. 18920 acted reasonably and in good faith at all times.
7. The costs, damages, and penalties Plaintiff seeks to recover or impose are unreasonable, excessive, arbitrary, and capricious.
8. Plaintiff is not entitled to recover attorneys' fees or costs, or fees of litigation.
9. 18920 reserves the right to plead additional defenses as may be appropriate depending upon facts later revealed during discovery.

**18920's REQUEST FOR RELIEF**

WHEREFORE, 18920 prays that Plaintiff's claims be dismissed, and that this Court award 18920 its costs, and award such other and further relief to which it may be justly entitled.

**DEMAND FOR JURY TRIAL**

18920 hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

JORDAN, LYNCH & CANCIENNE  
PLLC

/s/ Michael Cancienne

Michael Cancienne

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COUNSEL FOR 18920 NW 11th, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of June, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to all counsel of record in this case.

/s/ Michael Cancienne

Michael Cancienne